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**Product Safety & Regulatory Affairs
Health, Environment & Safety**

January 15, 2015

EPA East-Room 642B-Attn: Section 8(e)
U.S. Environmental Protection Agency
1201 Constitution Avenue NW
Washington, DC 20004-3302

RE: CAS Number: 25155-25-3

This submission is made by:
Arkema Inc.
900 First Avenue
King of Prussia, PA 19406-1308

Dear TSCA Section 8(e) Coordinator:

On behalf of Akzo Nobel Polymer Chemicals LLC and Arkema Inc, we are submitting draft summary results of an OECD 414 Prenatal Developmental Toxicity Study with peroxide, [1,3(or 1,4)-phenylenebis(1-methylethylidene)]bis[(1,1-dimethylethyl) CAS# 25155-25-3.

Nothing in this letter is considered business confidential information. This report does not involve effects in humans.

Female rats were administered the test article by oral gavage at 0, 100, 300 and 1000 mg/kg/bw/day in corn oil from day 6 *post coitum* (implantation) to day 20 *post coitum* (the day prior to Cesarean section).

Mortality, clinical signs, functional observations, body weight change, and food consumption were monitored during the study. Reproductive parameters (post implantation loss and number of fetuses per dam) and fetal evaluation were performed at the end of the study.

An increased incidence of anophthalmia (unilateral) was noted in all dosage groups. Four fetuses with this finding were identified in the study: one each in the 100 and 300 mg/kg/day dosage groups and two in the 1000 mg/kg/day dosage group. There were no affected fetuses in the control group. Although anophthalmia may occur spontaneously in the strain used in this study, it is a rare event seen not more than in one fetus per approximately 100 litters. No fetuses with anophthalmia were identified in the most recent historical controls. Therefore, this effect may be test article related.

No adverse effects were seen on maternal health or fetal skeletal development in any dosage group.

Please contact me if you have any questions or require additional information. I can be reached by telephone at (610) 205-7181.

Sincerely,

Rebecca J Bernstein, Senior Director
Product Safety and Regulatory Affairs

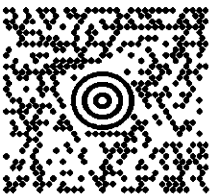

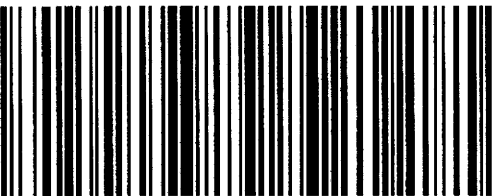

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